

CHAPTER 7 SAFETY SUBMISSION

7-1. Introduction.

a. The Safety Submission provides the specifications for conducting work activities at a RCWM project site. It details the scope of the project, the planned work activities, the potential site hazards and the methods of controlling the hazards. A Safety Submission is required when removal activities (e.g., surface removal of RCWM or excavations when the intent is to uncover, characterize, and remove geophysical anomalies that have the potential to be RCWM items) will be performed.

b. The USAESCH OE Design Center, is the only USACE office authorized to perform this work. The PM, in coordination with the USAESCH OE Design Center will prepare the Safety Submission and it will be approved by the Army Safety Office.

7-2. Contents. The Safety Submission is a detailed description of the work to be performed on the project site. Additional required plans are: Work Plan, Site Safety and Health Plan, and Supporting Plans. These three components are discussed below. A detailed outline of the contents of the Safety Submission may be found on the OE MCX website at <http://www.hnd.usace.army.mil/oew/policy/dids/didindx.html> as DID OE-060.

a. Work Plan.

(1) A site-specific Work Plan is required for all RCWM projects. Following the site visit, the Work Plan will be prepared to describe the methodology for accomplishing the RCWM response action.

(2) The Work Plan will be prepared in accordance with contract requirements. Generally, the Work Plan will discuss the topic areas provided below. If a topic area is not required for a particular project, the chapter will be included in the Work Plan with a declaration that the information was not required for the project. A detailed outline for the Work Plan may be found on the OE-MCX website at <http://www.hnd.usace.army.mil/oew>.

(a) Executive Summary.

(b) Project Overview.

(c) Intrusive Excavation.

(d) Contingency Plan.

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- (e) Intact Containers Monitoring and Disposal.
- (f) Scrap Monitoring and Disposal.
- (g) Soil Monitoring and Disposal.
- (h) Investigative Waste Monitoring and Disposal.
- (i) Chemical Data, Laboratory and Field Work Sampling.
- (j) Quality Control.
- (k) Site Specific Environmental Protection.

(3) A sample detailed outline for the RCWM Work Plan is included in the Safety Submission Outline. The outline presents the subcomponents required for each of the topic areas listed above.

b. Site Safety and Health Plan.

(1) Prior to performing on-site work, a SSHP in accordance with the requirements of 29 CFR 1910.120(b)(4), 29 CFR 1926.65(b)(4), ER 385-1-92, and the requirements to be published in ER 385-1-95.

(2) The SSHP will be prepared in accordance with contract requirements. The SSHP will discuss the topic areas provided below.

(a) Introduction. A reference to the Work Plan is sufficient to direct readers to detailed information on the site description; project scope and objectives; and staff organization, qualifications and responsibilities.

- (b) Public Safety Protocols.
- (c) Activity Hazard Analysis per task.
- (d) Identification and Analysis of Physical Hazards.
- (e) Accident Prevention and Reporting.
- (f) Training.
- (g) Personal Protective Equipment Plan.

- (h) Medical Surveillance and Medical Support.
- (i) Environmental and Personnel Monitoring.
- (j) Personnel and Equipment Decontamination.
- (k) Emergency Response and Contingency Plan.
- (l) Engineering Controls and Safe Work Practices.
- (m) Logs, Reporting and Record Keeping.

(3) A sample detailed outline for the RCWM SSHP is located on the OE MCX website at <http://www.hnd.usace.army.mil/oew/policy/dids/didindx.html> under DID OE-05-006. This outline presents the subcomponents required for each of the topic areas listed above. Chapter 8 of this pamphlet provides more detailed information on the safety considerations for RCWM response actions.

c. Supporting Plans. This section discusses the supporting plans required in the Safety Submission. These plans, which are prepared by government agencies, include: TEU Assessment Plan; ECBC Air Monitoring and Analysis Plan; Public Evacuation or Shelter-in-Place Plan; and PMNSCM Plans. At the time a SOW is provided to the contractors, a SOW is issued to TEU, ECBC and PMNSCM to initiate the preparation of the supporting plans.

(1) TEU Assessment Plan.

(a) This plan is prepared by the TEU and includes their standing operating procedures (SOPs), Operational Orders, and specific equipment operations manuals that will be used to support the cleanup efforts.

(b) TEU's responsibilities generally include the following tasks:

- Coordinate and provide input to the Work Plan and SSHP.
- Calculate the downwind hazard areas using the D2PC downwind hazard dispersion modeling tool.
- Aid contractor in the excavation activities within the exclusion zone when non-OE items are being excavated.
- Assess suspect RCWM.
- Package suspect RCWM.
- Transport suspect RCWM.

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(c) SOPs for Specific Items. The following SOPs, as applicable, must be located on-site:

- EOD Response to Ordnance Items.
- Use of the PINS.
- Use of the Raman spectrometer.
- Packaging.
- X-Ray Procedures.
- Assessment/re-assessment.

(2) ECBC Air Monitoring and Analysis Plan.

(a) Air monitoring methodologies for chemical agent.

- Near real time.
- Depot Area Air Monitoring System (DAAMS) tubes.
- Head space.
- Fenceline Open-Path Fourier Transform Infrared Spectrometry (OP-FTIR)

(b) Environmental analysis for chemical agents and degradation products.

- Soils.
- Liquid waste.

(3) Public Evacuation or Shelter-in-Place Plan. The USACE district, in close coordination with the USAESCH OE Design Center, will be responsible for these plans, as necessary. These plans will discuss the logistics of evacuation and alarm procedures, as required.

(4) PMNSCM Plans. The PMNSCM Plans are composed of the following sub-plans:

(a) Interim Holding Facility (IHF) Plan. The IHF Plan will address all matters concerning the temporary storage of recovered RCWM. This includes the physical location, design, physical security, equipment requirements, personnel training requirements, monitoring requirements, descriptions of all necessary activities required during operation, and surveillance requirements.

(b) Transportation Plan. The Transportation Plan will address all transportation matters concerning the movement of the RCWM item(s) from the exclusion zone to the IHF and from the IHF to the final destination point.

(c) Disposal Plan. The Disposal Plan will be provided by PMNSCM for the Safety Submission.

7-3. Review and Approval. Coordination, review and approval of RCWM Safety Submissions and corrections or amendments to RCWM Safety Submissions will be submitted in accordance with DACS-SF Memorandum, "Approval of Safety Submissions for Non-Stockpile Chemical Warfare Materiel (RCWM) Response Activities," 29 Feb 2000.

7-4. Amendments. Amendments to RCWM Safety Submissions should be signed by the same signatories (offices or agencies) as the original Safety Submission.